## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

| UNITED STATES OF AMERICA             | :  |
|--------------------------------------|--|
| v.<br>JEFFREY REED                   | : CRIMINAL NO. 17-369<br>:                           |
|                                      | ORDER  |
| AND NOW, to wit, this                | day of December, 2017, it is hereby ORDERED that the |
| requirement that Mr. Reed notify emp | loyer(s) of his guilty plea is removed.              |
| ·                                    |  |
|                                      | BY THE COURT:  |
|                                      |  |
|                                      |  |
|                                      | J.   |
|                                      |  |

## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

 $\mathbb{V}_{\bullet}$ 

:

CRIMINAL NO. 17-369

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**JEFFREY REED** 

MOTION TO MODIFIY BAIL CONDITIONS

- On November 28, 2017, defendant Jeffrey Reed pled guilty before this Court.
  Sentencing is scheduled for March 15, 2017.
- 2. As part of Mr. Reed's continued bail conditions, he was required to notify any employer(s) of his guilty plea.
- 3. Mr. Reed is an independent contractor who performs contract work for three (3) fuel suppliers. Mr. Reed does not receive any client funds. He is compensated on a per contract basis by the companies with which the companies he contracts.
- 4. Notifying those companies of his guilty plea would almost certainly result in his contracts being terminated.
- 5. Mr. Reed has no other source of income other than his contractual relationship with those companies. Should those contracts be terminated, he will have no source of income.
- 6. It is anticipated that Mr. Reed will, after sentencing, have some restitution obligations. Again, terminating those contracts would likely severely curtail Mr. Reed's ability to fulfill any financial obligations to the Court and/or any other recipients of restitution.

7. Counsel for Mr. Reed has consulted with the attorney for the Government, Anita Eve, who has indicated that the Government has no objection to the removal of the employer/contractor notification provision.

8. Counsel for Mr. Reed has also consulted with pre-trial services, Officer Christopher Narcisi, who has indicated that PTS takes no position on the within motion, deeming it solely the province of this Court.

WHEREFORE, it is respectfully requested that this Honorable Court remove the bail condition that Mr. Reed notify any of the companies with which he has contracts that he has pled guilty in the instant case.

Respectfully submitted,

GEORGE HENRY NEWMAN 400 S. Broad Street, Suite 2126

Philadelphia, PA 19110 215-592-9400

Attorney I.D. #21245

Counsel for Jeffrey Reed

## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

 $\mathbb{V}_{\bullet}$ 

**CRIMINAL NO. 17-369** 

JEFFREY REED

## **CERTIFICATE OF SERVICE**

I, George Henry Newman, hereby certify that on the day of December 2017, I did cause a true and correct copy of the within Motion, by electronic case filing to the following persons:

The Honorable Gerald J. Pappert United States District Courthouse 601 Market Street-Rm. 5614 Philadelphia, PA 19106

Anita Eve, AUSA United States Attorney 615 Chestnut Street-Suite 1250 Philadelphia, PA 19106

GEORGE HENRY NEWMAN

100 S. Broad Street, Suite 2126

Philadelphia, PA 19110

215-592-9400

Attorney I.D. #21245

Counsel for Jeffrey Reed